

AO 91 (Rev. 11/11) Criminal Complaint

AUSA: Julie Beck
Special Agent: ☒ Brian BishopTelephone: (313) 550-9333
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UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
Tasbir SINGH

Case No. 2:21-mj-30340
Judge: Unassigned,
Filed: 07-08-2021

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 7, 2021 in the county of Wayne in the
Eastern District of Michigan SD, the defendant(s) violated:

Code Section
21 U.S.C. § 841(a)(1),
18 U.S.C. § 961

Offense Description
Possession with the Intent to Distribute Controlled Substances.
Illegal Imports

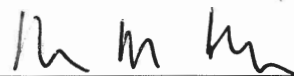
This criminal complaint is based on these facts:
SEE ATTACHED AFFIDAVIT

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: July 8, 2021

City and state: Detroit, Michigan



Complainant's signature

Brian Bishop, Special Agent, ICE-HSI

Printed name and title



Judge's signature

Hon. Patricia T. Morris, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Brian Bishop, being duly sworn, depose and state the following:

- 1) I am a Special Agent (SA) with the United States Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) in Detroit, Michigan, which is in the Eastern District of Michigan. I have approximately one and half years of federal law enforcement experience related to border enforcement activities with HSI. Prior to HSI, I was a Diversion Investigator with the Drug Enforcement Administration (DEA) in Detroit for over seven years. During my tenure with HSI and the DEA, I have conducted numerous investigations related to money laundering and drug distribution. The following information is based upon my own investigation and previous experiences as well as investigations conducted by fellow law enforcement officers and their previous experiences.
- 2) I have personally participated in the investigation set forth below. I am familiar with the facts and circumstances of the investigation through my personal participation, from discussions with other law enforcement officers and agents, from my discussions with witnesses and the suspect involved in the investigation, and from my review of records and reports related to the investigation. I have not included details of every aspect of the investigation.

FACTS AND CIRCUMSTANCES IN SUPPORT OF PROBABLE CAUSE

- 3) On July 7, 2021, at approximately 10:38 a.m., Customs and Border Protection Officers (CBPOs) of the Fort Street Cargo Facility Port of Entry (POE) in Detroit, Michigan contacted HSI SA Mark Koch as the on-call duty agent regarding an anomaly found during the inbound Customs inspection of a commercial truck driven by Tasbir SINGH, an Indian citizen, residing in Canada.
- 4) According to CBPOs, SINGH attempted to drive a commercial truck with attached commercial trailer from Windsor, Ontario, Canada to a final destination in Wooster, Ohio, via the Fort Street Cargo Facility POE in Detroit, Michigan at approximately 9:10 a.m. CBPOs referred SINGH and the commercial truck for a secondary inspection and conducted an x-ray of the truck and trailer at approximately 9:37 a.m. An anomaly was found in the x-ray. Upon further inspection by CBPOs, the anomaly revealed seven (7) pallets of suspected marijuana found in the trailer. A CBP K-9 alerted to the suspected marijuana at approximately 10:30 a.m. CBP then conducted a field test of a sample of the packages which returned positive results for the presence of marijuana, a Schedule 1 controlled substance. The search of the seven pallets of suspected marijuana revealed approximately 10 boxes per pallet containing a total of approximately 2,048 vacuum sealed packages, weighing a total of

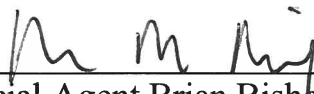
2,276.03 pounds (1,032.39 kg). CBPOs also discovered a GPS tracker attached to the outside of one of the boxes.

- 5) On July 7, 2021, HSI SA Koch and HSI Task Force Officer (TFO) Stephanie Brandt responded to the POE at approximately 11:25 a.m. to gather more information from CBP. HSI TFO Mark Driscoll and your affiant arrived at the POE at approximately 12:30 p.m. to assist. HSI TFO Driscoll, HSI TFO Brandt, and your affiant interviewed SINGH at approximately 1:35 p.m. The interview was conducted in English. While providing biographical information, SINGH provided the passcode to his cell phone. Approximately two minutes later, your affiant provided SINGH with his Miranda warnings, which SINGH subsequently waived, verbally and in writing, and agreed to speak with agents.
- 6) During the interview, agents repeatedly asked SINGH about the suspected marijuana found within the truck trailer. SINGH did not acknowledge ownership of the suspected marijuana and further denied knowledge that the suspected marijuana was in the truck trailer. SINGH stated he has been a truck driver for approximately one year with his current employer, and he had previously crossed the U.S. border on numerous occasions. SINGH stated his employer is Best Care Transport. He is the owner/operator of the truck and trailer he was driving. SINGH stated he picked up what he believed to be compression springs at 53 Bakersfield, North York, Ontario, Canada at

approximately 4:00 p.m. on July 6, 2021. After his truck was loaded and sealed by the shipper, SINGH placed his own seal on the trailer. SINGH stated he was required to remain in his truck due to COVID while the items were placed in his trailer by the shipper. He then drove to Best Care Transport's truck yard in Windsor, Ontario, Canada where the truck remained parked overnight while SINGH returned home for his required 10 hours of rest. SINGH stated he traveled back to the truck yard at approximately 8:00 a.m. on July 7, 2021 to retrieve his truck and trailer with the intention of driving it to 1147 Akron Road, Wooster, Ohio. SINGH stated he entered the address in Wooster, Ohio into his GPS at that time. Prior to reaching the border, SINGH was contacted by his dispatcher instructing him to deliver the load to a new address of 2330 International Street, Columbus, Ohio. The interview ended at approximately 2:35 p.m.

- 7) On July 7, 2021, CBPOs conducted a download of SINGH's cellphone which was provided to HSI TFO Driscoll for later review of potential evidence related to the investigation.
- 8) SINGH was subsequently escorted to a local police station and detained by agents pending his initial appearance in federal court. CBPOs seized all controlled substances, the truck, the trailer, one cell phone, two GPS devices, security seals, and a thumb drive.

- 9) Your affiant is aware that this criminal conduct occurred within the Eastern District of Michigan and based on experience, believes that the quantity of controlled substances seized is consistent with large scale smuggling/distribution activities. Your affiant places the monetary value of the seized controlled substances at approximately \$3,600,000.
- 10) Your affiant is aware that Canadian-grown marijuana has been routinely smuggled in commercial trucks from Canada into the United States where it has been distributed for the past 20 years. The distribution areas for this marijuana are typically in the midwestern and southeastern areas within the United States where large amounts of highly potent marijuana are difficult to purchase.
- 11) Based on the foregoing, there is probable cause to believe that Tasbir SINGH violated 21 United States Code, Section 841, Possession with the Intent to Distribute Controlled Substances; and 21 United States Code, Section 961, Illegal Imports.



Special Agent Brian Bishop
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to and subscribed before me in person or
by other reliable electronic means.



Honorable Patricia T. Morris
United States Magistrate Judge

Dated: July 8, 2021